

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION**

REBECCA YOUNG,)
Plaintiff,)
v.)
GILES COUNTY BOARD OF)
EDUCATION, PHILLIP J. WRIGHT)
In his individual and official capacity)
As Director of Schools for Giles County,)
Tennessee, and MICAH LANDERS, in)
His individual and official capacity as)
Principal of Richland High School,)
Defendants.)

No.: 1:15-cv-00107
CHIEF JUDGE SHARP
JURY DEMAND

AFFIDAVIT OF ROBYN BEALE WILLIAMS

The undersigned, Robyn Beale Williams, after being duly sworn according to law, states:

1. I am an attorney at law in the state of Tennessee and over the age of 18 years. I have personal knowledge of the facts stated herein, and I am competent to testify about those facts.

2. I have been assigned the representation of Defendants Giles County Board of Education, Phillip J. Wright, and Micah Landers in the above-captioned matter.

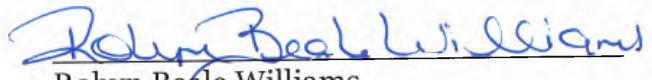
3. After speaking with my clients, it was my understanding that they were served on December 1, 2015 and believed that a responsive pleading was due by December 22, 2015.

4. I met with the defendants to begin gathering information responsive to the complaint and motion. However, potential witnesses with information pertinent to the issues in this case were on break due to the holidays.

5. On December 18, 2015 I contacted Plaintiff's counsel to obtain an extension of time to respond to the Complaint and Motion. Plaintiff's counsel agreed to extend the deadline to respond to the pleadings until December 31, 2015. Prior to filing a motion with the Court, an order issued.

6. Due to internet issues, I was unable to finalize and file the responsive pleading until I returned to my office January 4, 2016.

Further affiant sayeth not.


Robyn Beale Williams

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

Subscribed and sworn to before me this 5th day of January, 2016.


Notary Public

My commission expires: _____



Respectfully submitted,

/s/Robyn Beale Williams

Robyn Beale Williams, BPR #19736

FARRAR & BATES, LLP

211 Seventh Avenue North, Suite 500

Nashville, Tennessee 37219

(615) 254-3060

(615) 254-9835 Fax

robyn.williams@farrar-bates.com

Counsel for Giles County Board of Education, Phillip J. Wright, in his individual and official capacity as Director of Schools for Giles County, Tennessee, and Micah Landers, in his individual and official capacity as Principal of Richland High School

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of January 2016, a true and correct copy of the foregoing has been forwarded via the U.S. District Court's electronic notification system to:

Mark J. Downton

THE LAW OFFICE OF MARK J. DOWNTON

5654 Amalie Drive

Nashville, TN 37211

lawyerdownton@gmail.com

Counsel for Rebecca Young

Thomas H. Castelli

ACLU (NASHVILLE OFFICE)

P O Box 120160

Nashville, TN 37212

tcastelli@aclu-tn.org

Counsel for Rebecca Young

/s/ Robyn Beale Williams

Robyn Beale Williams